



October 4, 2018
Dave Daguirre
Montana DEQ - Air Quality Division
49 N Main street, Suite B
Butte, Montana 59701

RECEIVED

OCT 23 2018

Office of Enforcement, Compliance
and Environmental Justice

Sent via email: daguirre@mt.gov

Subject: Vanguard Operating LLC (Vanguard)
NSPS OOOOa Affected Facilities Located in Montana
Annual Report for the period between August 2, 2017 and August 2, 2018
40 CFR 60 Subpart OOOOa (Quad OOOOa), Standards of Performance for Crude Oil and Natural
Gas Facilities Constructed, Modified or Reconstructed after September 18, 2015

Dear Lars:

Vanguard is submitting the following Annual report per the requirements in 40 CFR§60.5420a (b). The current compliance period for Quad Oa started on August 2, 2017 and ended on August 2, 2018. Thus, the annual report for all affected facilities are due no later than 90 days after August 2, 2018, or October 31, 2018.

Appendix A contains the LDAR monitoring summary tables for affected facility surveyed during the compliance period.

Please note that Vanguard has one well pad facility subject to Quad Oa requirements for the current compliance period. The EBET 2-390 -API No. 25-009-21302- well (Ten Sleep) was completed in mid December 2017, however, no flowback was performed on the oil wells, since there is very little gas, instead they run the pump jack and turn everything to production and separate the water in the storage tanks.

I hereby certify that the information presented herein is correct to the best of my knowledge.

Please call for additional information or further assistance.

Sincerely,

(b) (9)

Mark Fridel
Senior Environmental Specialist

Phone: (b) (9)
Email: mfridel@vnreenergy.com

EPA
COPY REGION 8

CERTIFIED MAIL 7017 2680 0600 8140 0365

5847 San Felipe, Suite 3000
Houston, Texas 77057

832.377.2200 Office

WWW.VNREENERGY.COM

Annual NSPS OOOOa Report
Vanguard Operating LLC
October 24th 2018

**Certification by Responsible Official
Per 60.5420a(b)(1)(iv)**

Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Name: Mr. Scott Sloan

Title: President and CEO

(b) (9)

Date: 10-4-2018

Annual NSPS OOOOa Report
Vanguard Operating LLC
October 2nd, 2018

In compliance with the requirements of 40 CFR 60.5420a (b), Vanguard is submitting the following initial Semi-Annual NSPS OOOOa Report.

(a) You must submit the notifications according to paragraphs (a)(1) and (2) of this section if you own or operate one or more of the affected facilities specified in § 60.5365a that was constructed, modified or reconstructed during the reporting period.

(1) If you own or operate an affected facility that is the group of all equipment within a process unit at an onshore natural gas processing plant, or a sweetening unit at an onshore natural gas processing plant, you must submit the notifications required in § 60.7(a)(1), (3), and (4). If you own or operate a well, centrifugal compressor, reciprocating compressor, pneumatic controller, pneumatic pump, storage vessel, or collection of fugitive emissions components at a well site or collection of fugitive emissions components at a compressor station, you are not required to submit the notifications required in § 60.7(a)(1), (3), and (4).

(2)

(i) If you own or operate a well affected facility, you must submit a notification to the Administrator no later than 2 days prior to the commencement of each well completion operation listing the anticipated date of the well completion operation. The notification shall include contact information for the owner or operator; the United States Well Number; the latitude and longitude coordinates for each well in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983; and the planned date of the beginning of flowback. You may submit the notification in writing or in electronic format.

(ii) If you are subject to state regulations that require advance notification of well completions and you have met those notification requirements, then you are considered to have met the advance notification requirements of paragraph (a)(2)(i) of this section.

(b) Reporting requirements. You must submit annual reports containing the information specified in paragraphs (b)(1) through (b)(8) and (b)(12) of this section to the Administrator and performance test reports as specified in paragraph (b)(9) or (b)(10) of this section except as provided in (b)(13). You must submit annual reports following the procedure specified in paragraph (b)(11) of this section. The initial annual report is due no later than 90 days after the end of the initial compliance period (August 2, 2017) as determined according to §60.5410a. Thus, this initial report is due no later than October 31, 2017. Subsequent annual reports are due no later than same date each year as the initial annual report. If you own or operate more than one affected facility, you may submit one report for multiple affected facilities provided the report contains all of the information required as specified in paragraphs (b)(1) through (8) of this section except as provided in (b)(13). Annual reports may coincide with title V reports as long as all the required elements of the annual report are included. You may arrange with the Administrator a common schedule on which reports required by this part may be submitted as long as the schedule does not extend the reporting period.

(1) The general information specified in paragraphs (b)(1)(i) through (iv) of this section.

(i) The company name and address of the affected facility.

Response:

All affected facilities in this report are under *Vanguard Operating LLC*.

Physical Address:
5847 San Felipe, Suite 3000
Houston, Texas 77057

Annual NSPS OOOOa Report
Vanguard Operating LLC
October 2nd, 2018

Mailing Address:
The same as above.

(ii) An identification of each affected facility being included in the annual report.

Response:

Yes. See the affected facility listed in *Appendix A*

(iii) Beginning and ending dates of the reporting period.

Response:

Beginning date of reporting period: August 2, 2017

Ending date of reporting period: August 2, 2018

(iv) A certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Response:

Yes. Such certification is attached to this report.

(2) For each gas well affected facility, the information in paragraphs (b)(2)(i) through (iii) of this section.

(i) Records of each well completion operation as specified in paragraph (c)(1)(i) through (iv) and (vi) of this section for each gas well affected facility conducted during the reporting period. In lieu of submitting the records specified in paragraph (c)(1)(i) through (iv), the owner or operator may submit a list of the well completions with hydraulic fracturing completed during the reporting period and the records required by paragraph (c)(1)(v) of this section for each well completion.

(ii) Records of deviations specified in paragraph (c)(1)(ii) of this section that occurred during the reporting period.

(c) (1)(i) to (c) (1)(v) are quoted for gas well affect facilities as following:

(c) Recordkeeping requirements. You must maintain the records identified as specified in §60.7(f) and in paragraphs (c)(1) through (16) of this section. All records required by this subpart must be maintained either onsite or at the nearest local field office for at least 5 years. Any records submitted electronically through the EPA CDX may be maintained in electronic format.

(1) The records for each gas well affected facility as specified in paragraphs (c)(1)(i) through (vii) of this section.

(i) Records identifying each well completion operation for each gas well affected facility;

(ii) Records of deviations in cases where well completion operations with hydraulic fracturing were not performed in compliance with the requirements specified in §60.5375a.

(iii) Records required in §60.5375a (b) or (f)(3) for each well completion operation conducted for each gas well affected facility that occurred during the reporting period. You must maintain the records specified in paragraphs (c)(1)(iii)(A) through (C) of this section.

(A) For each well affected facility required to comply with the requirements of § 60.5375a(a), you must record: The location of the well; the United States Well Number; the date and time of the onset of flowback following hydraulic fracturing or refracturing; the date and time of each attempt to direct flowback to a separator as required in § 60.5375a(a)(1)(ii); the date and time of each occurrence of returning to the initial flowback stage under § 60.5375a(a)(1)(i); and the date and time that the well was shut in and the flowback equipment was permanently disconnected, or the startup of production; the duration of flowback; duration of recovery and disposition of recovery (i.e., routed to the gas flow line or collection system, re-injected into the well or another well, used as an onsite fuel source, or used for another useful purpose that a purchased fuel or raw material would serve); duration of combustion; duration of venting; and specific reasons for venting in lieu of capture or combustion. The duration must be specified in hours. In addition, for wells where it is technically infeasible to route the recovered gas to any of the four options specified in § 60.5375a(a)(1)(ii), you must record the reasons for the claim of technical infeasibility with respect to all four options provided in that subparagraph, including but not limited to; name and location of the nearest gathering line and technical considerations preventing routing to this line; capture, reinjection, and reuse technologies considered and aspects of gas or equipment preventing use of recovered gas as a fuel onsite; and technical considerations preventing use of recovered gas for other useful purpose that that a purchased fuel or raw material would serve.

(B) For each well affected facility required to comply with the requirements of § 60.5375a(f), you must maintain the records specified in paragraph (c)(1)(iii)(A) of this section except that you do not have to record the duration of recovery to the flow line.

(C) For each well affected facility for which you make a claim that it meets the criteria of § 60.5375a(a)(1)(iii)(A), you must maintain the following:

(1) Records specified in paragraph (c)(1)(iii)(A) of this section except that you do not have to record: The date and time of each attempt to direct flowback to a separator; the date and time of each occurrence of returning to the initial flowback stage; duration of recovery and disposition of recovery (i.e. routed to the gas flow line or collection system, re-injected into the well or another well, used as an onsite fuel source, or used for another useful purpose that a purchased fuel or raw material would serve).

(2) If applicable, records that the conditions of § 60.5375a(1)(iii)(A) are no longer met and that the well completion operation has been stopped and a separator installed. The records shall include the date and time the well completion operation was stopped and the date and time the separator was installed.

(3) A record of the claim signed by the certifying official that no liquids collection is at the well site. The claim must include a certification by a certifying official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(iv) For each gas well facility for which you claim an exception under § 60.5375(a)(3), you must record: The location of the well; the API well number; the specific exception claimed; the starting date and ending date for the period the well operated under the exception; and an explanation of why the well meets the claimed exception.

(v) For each gas well affected facility required to comply with both §60.5375(a)(1) and (3), if you are using a digital photograph in lieu of the records required in paragraphs (c)(1)(i) through (iv) of this section, you must retain the records of the digital photograph as specified in §60.5410(a)(4).

(vi) For each well affected facility for which you make a claim that the well affected facility is not subject to the well completion standards according to 60.5375a(g), you must maintain:

(A) A record of the analysis that was performed in order to make that claim, including but not limited to, GOR values for established leases and data from wells in the same basin and field;

(B) The location of the well; the United States Well Number;

(C) A record of the claim signed by the certifying official. The claim must include a certification by a certifying official of truth, accuracy, and completeness.

This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(vii) For each well affected facility for which you determine according to § 60.5432a that it is a low pressure well, a record of the determination and supporting inputs and calculations.

Response:

VANGUARD had one gas and oil well completion with no hydro-fracking during the reporting period. Thus no records are required. There was no deviation during this period.

(2) For each centrifugal compressor affected facility, you must maintain records of deviations in cases where the centrifugal compressor was not operated in compliance with the requirements specified in § 60.5380a. Except as specified in paragraph (c)(2)(vii) of this section, you must maintain the records in paragraphs (c)(2)(i) through (vi) of this section for each control device tested under § 60.5413a(d) which meets the criteria in § 60.5413a(d)(1) and § 60.5413a(e) and used to comply with § 60.5380a(a)(1) for each centrifugal compressor.

(i) Make, model and serial number of purchased device.

(ii) Date of purchase.

(iii) Copy of purchase order.

(iv) Location of the centrifugal compressor and control device in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983.

(v) Inlet gas flow rate.

(vi) Records of continuous compliance requirements in § 60.5413a(e) as specified in paragraphs (c)(2)(vi)(A) through (E) of this section.

(A) Records that the pilot flame is present at all times of operation.

(B) Records that the device was operated with no visible emissions except for periods not to exceed a total of 1 minute during any 15 minute period.

(C) Records of the maintenance and repair log.

(D) Records of the visible emissions test following return to operation from a maintenance or repair activity.

(E) Records of the manufacturer's written operating instructions, procedures and maintenance schedule to ensure good air pollution control practices for minimizing emissions.

(vii) As an alternative to the requirements of paragraph (c)(2)(iv) of this section, you may maintain records of one or more digital photographs with the date the photograph was taken and the latitude and longitude of the centrifugal compressor and control device imbedded within or stored with the digital file. As an alternative to imbedded latitude and longitude within the digital photograph, the digital photograph may consist of a photograph of the centrifugal compressor and control device with a photograph of a separately operating GPS device within the same digital picture, provided the latitude and longitude output of the GPS unit can be clearly read in the digital photograph.

Response:

Not applicable. VANGUARD did not have any centrifugal compressor affected facilities during this reporting period.

(3) For each reciprocating compressor affected facility, you must maintain the records in paragraphs (c)(3)(i) through (iii) of this section.

(i) Records of the cumulative number of hours of operation or number of months since initial startup or the previous replacement of the reciprocating compressor rod packing, whichever is later. Alternatively, a statement that emissions from the rod packing are being routed to a process through a closed vent system under negative pressure.

(ii) Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).

(iii) Records of deviations in cases where the reciprocating compressor was not operated in compliance with the requirements specified in § 60.5385a.

Response:

Not applicable. VANGUARD did not have any reciprocating compressor affected facilities during this reporting period.

(4) For each pneumatic controller affected facility, you must maintain the records identified in paragraphs (c)(4)(i) through (v) of this section, as applicable.

(i) Records of the date, location and manufacturer specifications for each pneumatic controller constructed, modified or reconstructed.

(ii) Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why.

(iii) If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour.

(iv) If the pneumatic controller is located at a natural gas processing plant, records of the documentation that the natural gas bleed rate is zero.

(v) Records of deviations in cases where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a.

Response:

Not applicable. VANGUARD did not have any pneumatic controller affected facilities during this reporting period.

(5) For each storage vessel affected facility, you must maintain the records identified in paragraphs (c)(5)(i) through (vi) of this section.

(i) If required to reduce emissions by complying with § 60.5395a(a)(2), the records specified in §§ 60.5420a(c)(6) through (8), 60.5416a(c)(6)(ii), and 60.5416a(c)(7)(ii). You must maintain the records in paragraph (c)(5)(vi) of this part for each control device tested under § 60.5413a(d) which meets the criteria in § 60.5413a(d)(11) and § 60.5413a(e) and used to comply with § 60.5395a(a)(2) for each storage vessel.

(ii) Records of each VOC emissions determination for each storage vessel affected facility made under § 60.5365a(e) including identification of the model or calculation methodology used to calculate the VOC emission rate.

(iii) Records of deviations in cases where the storage vessel was not operated in compliance with the requirements specified in §§ 60.5395a, 60.5411a, 60.5412a, and 60.5413a, as applicable.

(iv) For storage vessels that are skid-mounted or permanently attached to something that is mobile (such as trucks, railcars, barges or ships), records indicating the number of consecutive days that the vessel is located at a site in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment. If a storage vessel is removed from a site and, within 30 days, is either returned to the site or replaced by another storage vessel at the site to serve the same or similar function, then the entire period since the original storage vessel was first located at the site, including the days when the storage vessel was removed, will be added to the count towards the number of consecutive days.

(v) You must maintain records of the identification and location of each storage vessel affected facility.

(vi) Except as specified in paragraph (c)(5)(vi)(G) of this section, you must maintain the records specified in paragraphs (c)(5)(vi)(A) through (F) of this section for each control device tested under § 60.5413a(d) which meets the criteria in § 60.5413a(d)(11) and § 60.5413a(e) and used to comply with § 60.5395a(a)(2) for each storage vessel.

(A) Make, model and serial number of purchased device.

(B) Date of purchase.

(C) Copy of purchase order.

(D) Location of the control device in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983.

(E) Inlet gas flow rate.

(F) Records of continuous compliance requirements in § 60.5413a(e) as specified in paragraphs (c)(5)(vi)(F)(1) through (5) of this section.

(1) Records that the pilot flame is present at all times of operation.

(2) Records that the device was operated with no visible emissions except for periods not to exceed a total of 1 minute during any 15 minute period.

(3) Records of the maintenance and repair log.

- (4) Records of the visible emissions test following return to operation from a maintenance or repair activity.
- (5) Records of the manufacturer's written operating instructions, procedures and maintenance schedule to ensure good air pollution control practices for minimizing emissions.
- (G) As an alternative to the requirements of paragraph (c)(5)(vi)(D) of this section, you may maintain records of one or more digital photographs with the date the photograph was taken and the latitude and longitude of the storage vessel and control device imbedded within or stored with the digital file. As an alternative to imbedded latitude and longitude within the digital photograph, the digital photograph may consist of a photograph of the storage vessel and control device with a photograph of a separately operating GPS device within the same digital picture, provided the latitude and longitude output of the GPS unit can be clearly read in the digital photograph.

Response:

Not applicable. VANGUARD did not have any storage vessel affected facilities during this reporting period. All storage vessels have been controlled and taken state-enforceable limit to stay below 6 tpy of VOCs to be opt out of NSPS OOOO applicability.

- (6) Records of each closed vent system inspection required under § 60.5416a(a)(1) and (2) for centrifugal compressors, reciprocating compressors and pneumatic pumps, or § 60.5416a(c)(1) for storage vessels.
- (7) A record of each cover inspection required under § 60.5416a(a)(3) for centrifugal or reciprocating compressors or § 60.5416a(c)(2) for storage vessels.
- (8) If you are subject to the bypass requirements of § 60.5416a(a)(4) for centrifugal compressors, reciprocating compressors or pneumatic pumps, or § 60.5416a(c)(3) for storage vessels, a record of each inspection or a record of each time the key is checked out or a record of each time the alarm is sounded.
- (9) If you are subject to the closed vent system no detectable emissions requirements of § 60.5416a(b) for centrifugal compressors, reciprocating compressors or pneumatic pumps, a record of the monitoring conducted in accordance with § 60.5416a(b).
- (10) For each centrifugal compressor or pneumatic pump affected facility, records of the schedule for carbon replacement (as determined by the design analysis requirements of § 60.5413a(c)(2) or (3)) and records of each carbon replacement as specified in § 60.5412a(c)(1).
- (11) For each centrifugal compressor affected facility subject to the control device requirements of § 60.5412a(a), (b), and (c), records of minimum and maximum operating parameter values, continuous parameter monitoring system data, calculated averages of continuous parameter monitoring system data, results of all compliance calculations, and results of all inspections.
- (12) For each carbon adsorber installed on storage vessel affected facilities, records of the schedule for carbon replacement (as determined by the design analysis requirements of § 60.5412a(d)(2)) and records of each carbon replacement as specified in § 60.5412a(c)(1).
- (13) For each storage vessel affected facility subject to the control device requirements of § 60.5412a(c) and (d), you must maintain records of the inspections, including any corrective actions taken, the manufacturers' operating instructions, procedures and maintenance schedule as specified in

Annual NSPS OOOOa Report
Vanguard Operating LLC
October 2nd, 2018

§ 60.5417a(h)(3). You must maintain records of EPA Method 22 of appendix A-7 of this part, section 11 results, which include: Company, location, company representative (name of the person performing the observation), sky conditions, process unit (type of control device), clock start time, observation period duration (in minutes and seconds), accumulated emission time (in minutes and seconds), and clock end time. You may create your own form including the above information or use Figure 22-1 in EPA Method 22 of appendix A-7 of this part. Manufacturer's operating instructions, procedures and maintenance schedule must be available for inspection.

(14) A log of records as specified in § 60.5412a(d)(1)(iii), for all inspection, repair and maintenance activities for each control device failing the visible emissions test.

Response:

The VANGUARD well has no equipment subject to this subpart.

(15) For each collection of fugitive emissions components at a well site and each collection of fugitive emissions components at a compressor station, the records identified in paragraphs (c)(15)(i) through (iii) of this section.

(i) The fugitive emissions monitoring plan as required in § 60.5397a(b), (c), and (d).

(ii) The records of each monitoring survey as specified in paragraphs (c)(15)(ii)(A) through (I) of this section.

(A) Date of the survey.

(B) Beginning and end time of the survey.

(C) Name of operator(s) performing survey. You must note the training and experience of the operator.

(D) Monitoring instrument used.

(E) When optical gas imaging is used to perform the survey, one or more digital photographs or videos, captured from the optical gas imaging instrument used for conduct of monitoring, of each required monitoring survey being performed. The digital photograph must include the date the photograph was taken and the latitude and longitude of the collection of fugitive emissions components at a well site or collection of fugitive emissions components at a compressor station imbedded within or stored with the digital file. As an alternative to imbedded latitude and longitude within the digital file, the digital photograph or video may consist of an image of the monitoring survey being performed with a separately operating GPS device within the same digital picture or video, provided the latitude and longitude output of the GPS unit can be clearly read in the digital image.

(F) Fugitive emissions component identification when Method 2.1 is used to perform the monitoring survey.

(G) Ambient temperature, sky conditions, and maximum wind speed at the time of the survey.

(H) Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.

(I) Documentation of each fugitive emission, including the information specified in paragraphs (c)(15)(ii)(1) through (12) of this section.

(1) Location.

Annual NSPS OOOOa Report
Vanguard Operating LLC
October 2nd, 2018

- (2) Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.
 - (3) Number and type of components for which fugitive emissions were detected.
 - (4) Number and type of difficult-to-monitor and unsafe-to-monitor fugitive emission components monitored.
 - (5) Instrument reading of each fugitive emissions component that requires repair when Method 21 is used for monitoring.
 - (6) Number and type of fugitive emissions components that were not repaired as required in § 60.5397a(h).
 - (7) Number and type of components that were tagged as a result of not being repaired during the monitoring survey when the fugitive emissions were initially found as required in § 60.5397a(h)(3)(ii).
 - (8) If a fugitive emissions component is not tagged, a digital photograph or video of each fugitive emissions component that could not be repaired during the monitoring survey when the fugitive emissions were initially found as required in § 60.5397a(h)(3)(ii). The digital photograph or video must clearly identify the location of the component that must be repaired. Any digital photograph or video required under this paragraph can also be used to meet the requirements under paragraph (c)(15)(ii)(E) of this section, as long as the photograph or video is taken with the optical gas imaging instrument, includes the date and the latitude and longitude are either imbedded or visible in the picture.
 - (9) Repair methods applied in each attempt to repair the fugitive emissions components.
 - (10) Number and type of fugitive emission components placed on delay of repair and explanation for each delay of repair.
 - (11) The date of successful repair of the fugitive emissions component.
 - (12) Instrumentation used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding.
- (iii) For the collection of fugitive emissions components at a compressor station, if a monitoring survey is waived under § 60.5397a(g)(5), you must maintain records of the average calendar month temperature, including the source of the information, for each calendar month of the quarterly monitoring period for which the monitoring survey was waived.

Response:

Records of LDAR inspections for fugitive components at this well site, number monitored, number of leakers found and repair records are attached to this report as Appendix A.

- (16) For each pneumatic pump affected facility, you must maintain the records identified in paragraphs (c)(16)(i) through (v) of this section.
 - (i) Records of the date, location and manufacturer specifications for each pneumatic pump constructed, modified or reconstructed.
 - (ii) Records of deviations in cases where the pneumatic pump was not operated in compliance with the requirements specified in § 60.5393a.

Annual NSPS OOOOa Report
Vanguard Operating LLC
October 2nd, 2018

(iii) Records on the control device used for control of emissions from a pneumatic pump including the installation date, manufacturer's specifications, and if the control device is designed to achieve less than 95 percent emission reduction, a design evaluation or manufacturer's specifications indicating the percentage reduction achieved the control device is designed to achieve.

(iv) Records substantiating a claim according to § 60.5393a(b)(5) that it is technically infeasible to capture and route emissions from a pneumatic pump to a control device or process; including the qualified professional engineer certification according to § 60.5393a(b)(5)(ii) and the records of the engineering assessment of technical infeasibility performed according to § 60.5393a(b)(5)(iii).

(v) You must retain copies of all certifications, engineering assessments and related records for a period of five years and make them available if directed by the implementing agency.

VANGUARD will keep the records required by this subpart if applicable.

(17) For each closed vent system routing to a control device or process, the records of the assessment conducted according to § 60.5411a(d):

(i) A copy of the assessment conducted according to § 60.5411a(d)(1);

(ii) A copy of the certification according to § 60.5411a(d)(1)(i); and

(iii) The owner or operator shall retain copies of all certifications, assessments and any related records for a period of five years, and make them available if directed by the delegated authority.

Annual NSPS OOOOa Report
Vanguard Operating LLC
October 2nd, 2018

Appendix A

Summary of LDAR Fugitive Leak Inspections and Repairs Gas Well Affected Facilities between August 2, 2017 and August 2, 2018

Well Site

EBET 2-390 –API No. 25-009-21302- well (Ten Sleep)

The asterisk (*) next to each field indicates that the corresponding field is required.

FACILITY INFORMATION								ADDITIONAL INFORMATION				
Facility Record No. *	Facility Name *	Address of Processing Plant *	Address 2	City *	County *	State Abbreviation *	Zip Code *	Responsible Agency Facility ID (State Facility Identifier)	Beginning Date of Reporting Period *	Ending Date of Reporting Period *	Please enter any additional information	Enter associated file name reference.
e.g.: ABC Company 1 ENET 2-190	e.g.: 123 Main Street (b) (9)	e.g.: Suite 100		e.g.: Brooklyn Belfry	e.g.: Kings County Carbon County	e.g.: NY MT	e.g.: 11221 59008		e.g.: 01/01/2018 08/02/2018	e.g.: 06/30/2018 06/02/2018		e.g.: Wrennha.jpg MAttachment.PDF

An owner or operator must include the following information in the initial semiannual report in addition to the information required in §60.487a(b)(1) through (4): Number of pressure relief devices subject to the requirements of §60.5401a(b) except for those pressure relief devices designated for no detectable emissions under the provisions of §60.482-4a(a) and those pressure relief devices complying with §60.482-4a(c).

The asterisk (*) next to each field indicates that the corresponding field is required.

EQUIPMENT INFORMATION

Facility Record No. * (Select from dropdown list)	Process unit Identification * (§60.487a(b)(1))	Number of pressure relief devices * (§60.5422a(b))	Number of valves, excluding those valves designated for no detectable emissions * (§60.487a(b)(2))	Number of pumps, excluding those pumps designated for no detectable emissions and those pumps complying with §60.482-2a(f) * (§60.487a(b)(3))	Number of connectors * (§60.487a(b)(5), §60.5422a(a))
e.g.: HVDry-1a	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5
1 EBET 2-390		0	22	0	101

An owner or operator must include the information specified in paragraphs (c)(1) and (2) of this section in all semiannual reports in addition to the information required in §60.487a(c)(2)(i) through (vi): (1) Number of pressure relief devices for which leaks were detected as required in §60.5401a(b)(2); and (2) Number of pressure relief devices for which leaks were not repaired as required in §60.5422a(c)(2)(ii). The asterisk (*) next to each field indicates that the corresponding field is required.

EQUIPMENT INFORMATION

Facility Record No. * (Select from dropdown list)	Month Identification* (Select from dropdown list)	Number of pressure relief devices for which leaks were detected * (§60.5422a(c)(i)) e.g.: 5	Number of pressure relief devices for which leaks were not repaired * (§60.5422a(c)(ii)) e.g.: 5	Number of valves for which leaks were detected * (§60.487a(c)(2)(i)) e.g.: 5	Number of valves for which leaks were not repaired * (§60.487a(c)(2)(ii)) e.g.: 5	Number of pumps for which leaks were detected * (§60.487a(c)(2)(iii)) e.g.: 5	Number of pumps for which leaks were not repaired * (§60.487a(c)(2)(iv)) e.g.: 5	Number of connectors for which leaks were detected * (§60.487a(c)(2)(vii), §60.5422a(a)) e.g.: 5	Number of connectors for which leaks were not repaired * (§60.487a(c)(2)(viii), §60.5422a(a)) e.g.: 5
1 March		0	0	0	0	0	0	0	0
1 September		0	0	0	0	0	0	0	0